

EXHIBIT B
FILED UNDER SEAL

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

CASE NUMBER: 16-cv-1054 (WMW/DTS)

Fair Isaac Corporation, a Delaware corporation,
Plaintiff,
versus
Federal Insurance Company, and Indiana
corporation, and ACE American Insurance Company, a
Pennsylvania corporation,
Defendants.

VIDEOTAPED DEPOSITION OF FEDERAL RULE OF CIVIL
PROCEDURE 30(b)(6) FEDERAL INSURANCE COMPANY and
ACE AMERICAN INSURANCE COMPANY WITNESS DESIGNEE

RAMESH PANDEY



TAKEN: 26 November 2019

BY: Jackie McKone

<p style="text-align: right;">Page 18</p> <p>1 discussions with the people you identified.</p> <p>2 A. Yup.</p> <p>3 Q. Okay. With respect to the information on Exhibit</p> <p>4 527, is any of this information -- do you know any</p> <p>5 of this information from your own personal</p> <p>6 knowledge?</p> <p>7 A. Yes. The data center is first. So this last</p> <p>8 column that you see that I have firsthand</p> <p>9 information. Versions, like 6.7, 7.1, I have</p> <p>10 firsthand knowledge. Exact date, I knew the years</p> <p>11 but the date whether it's Number 6, or Number 5,</p> <p>12 or Number 8, that was the discussion with talking</p> <p>13 to bunch of people and zeroing. So like I said,</p> <p>14 last column, first column. Middle column that's</p> <p>15 where we had to -- dates, and you asked for very</p> <p>16 specific dates.</p> <p>17 Q. Um-hm. Because then -- my understanding being</p> <p>18 that your geographic scope of responsibilities has</p> <p>19 been North America.</p> <p>20 A. Which is US and Canada.</p> <p>21 Q. Which US and Canada.</p> <p>22 A. Yes.</p> <p>23 Q. My question is: How did you have firsthand</p> <p>24 knowledge of the installations and the data center</p> <p>25 in UK or Europe?</p>	<p style="text-align: right;">Page 20</p> <p>1 know separate from -- my questions are separate</p> <p>2 from the -- separate from the conferences and the</p> <p>3 discussions that you had to prepare the</p> <p>4 information on Exhibit 527.</p> <p>5 My question is: How or whether, you know,</p> <p>6 you knew this information of your own knowledge</p> <p>7 while you were chief architect of North America.</p> <p>8 MS. JANUS: Asked and answered. It's</p> <p>9 outside the scope of the topics. Let's get back</p> <p>10 scope of the topics. Do you understand the</p> <p>11 question?</p> <p>12 THE WITNESS: Yes I do.</p> <p>13 BY MR. HINDERAKER:</p> <p>14 Q. Please answer it.</p> <p>15 MS. JANUS: So the question is: What did</p> <p>16 you know based on your own firsthand knowledge?</p> <p>17 THE WITNESS: For the -- you're talking</p> <p>18 about Europe?</p> <p>19 BY MR. HINDERAKER:</p> <p>20 Q. I was. Yes.</p> <p>21 A. Okay. So Europe -- if you have a system which is</p> <p>22 deployed in North America, but if somebody wants</p> <p>23 to use it in, let's say, the UK, they would ask us</p> <p>24 for help. Let's say that I have a -- you use,</p> <p>25 like -- we use Blaze software, can you recommend,</p>
<p style="text-align: right;">Page 19</p> <p>1 A. So Europe, this is in Legacy Chubb before merger,</p> <p>2 most of the systems were deployed in North America</p> <p>3 data center, which is Raleigh, North Carolina.</p> <p>4 Even if they were used by, let's say, London, or</p> <p>5 Australia, anybody, the systems were deployed in</p> <p>6 Raleigh. So that's why I know those systems.</p> <p>7 Q. So I understand why you know the systems in</p> <p>8 Raleigh. My question is: How would you know what</p> <p>9 was happening in the data center in the UK during</p> <p>10 your time as North American chief architect?</p> <p>11 A. So let's take the application. If you --</p> <p>12 MS. JANUS: I'm confused by this</p> <p>13 questioning. He's just talked about all the</p> <p>14 things he did to prepare for today. So what are</p> <p>15 you asking him about now?</p> <p>16 MR. HINDERAKER: I'm asking about what</p> <p>17 information is his own firsthand knowledge.</p> <p>18 MS. JANUS: Yes. He gave you that. He</p> <p>19 answered your question about that.</p> <p>20 MR. HINDERAKER: Thank you for your</p> <p>21 commentary.</p> <p>22 MS. JANUS: I just -- I'm not --</p> <p>23 BY MR. HINDERAKER:</p> <p>24 Q. I want to know during your time as chief architect</p> <p>25 of North America, did you have -- how would you</p>	<p style="text-align: right;">Page 21</p> <p>1 well, like, who could help to deploy in London.</p> <p>2 So we give the name of Blaze person --</p> <p>3 Q. Give the what?</p> <p>4 A. Fair Isaac person name, and say ask these guys,</p> <p>5 they will send a couple of people to help you out,</p> <p>6 install it or train you. That's what we did.</p> <p>7 When they reached out to us, we told Mike</p> <p>8 Swoyer from Fair Isaac at that time we call Blaze,</p> <p>9 and Blaze send a couple of people to help European</p> <p>10 team to deploy -- like, configure it and make it</p> <p>11 work. They send couple of people to help them</p> <p>12 out.</p> <p>13 Q. Did you have that conversation with Mike Swoyer?</p> <p>14 A. That's my team.</p> <p>15 Q. No. I didn't ask your team. I said: Did you?</p> <p>16 A. I knew that they were going. I didn't approve</p> <p>17 this. My boss approved it at that time, but yes,</p> <p>18 I was part of the discussion.</p> <p>19 Q. Did you have the conversation with Mike Swoyer?</p> <p>20 A. Not me, but my team.</p> <p>21 Q. Understood.</p> <p>22 A. The guy who reported to me did.</p> <p>23 Q. Who reported to you?</p> <p>24 A. Henry Mirollyuz, and I reported to Patrick Ceylon</p> <p>25 who signed this.</p>

<p style="text-align: right;">Page 22</p> <p>1 (Whereupon material was marked for 2 identification as Exhibit 528.) 3 BY MR. HINDERAKER: 4 Q. Showing you Exhibit 528, which is the Rule 5 30(b)(6) deposition notice for today, and you've 6 seen this before have you, or have you seen this 7 before? 8 A. Yes. 9 Q. And you're here of course to testify to the three 10 topics of the deposition notice? 11 A. Yes. 12 Q. Okay. Oh. This already has been marked as an 13 exhibit. So this is Exhibit 8 from another 14 deposition Mr. Ramesh, and take a moment to 15 familiarize yourself with it if you'd like, and I 16 just have a couple of questions. 17 A. Okay. 18 Q. All right. I don't see that you are involved in 19 this e-mail. Do you agree? 20 A. Not on this one. 21 Q. Okay. Did you review this document in preparing 22 for the deposition today? 23 A. Which document? 24 Q. The one in your hand, Exhibit 8? 25 A. This one, yes.</p>	<p style="text-align: right;">Page 24</p> <p>1 the first page of Exhibit 8 that says, "Hi Tony, I 2 copied Blaze." 3 A. Yes. In our CR drive sitting in Raleigh, North 4 Carolina on this date. 5 Q. So the SREF -- 6 A. File server. 7 Q. -- S01 that's a server in Raleigh, North Carolina? 8 A. Yes. It's the file server 01 public BR COE. This 9 naming was found in Raleigh. 10 Q. Understood. So on that -- on that part of the 11 e-mail, Henry is telling Tony that he copied Blaze 12 Advisor file to that server? 13 A. Yeah. That's, like, a Raleigh server to Raleigh 14 server. A CR drive. That's what it is. 15 Q. Then Henry is telling Tony where Henry -- where 16 Tony can find installation instructions? 17 A. Yeah. This is a wiki link and the file server is 18 in Raleigh. Chubb in Raleigh. 19 Q. Then Tony Zhang on the top of the e-mail says, 20 "Henry, thanks Henry. I was able to install it." 21 A. In development center in Raleigh. Yes. 22 Q. Okay. Now, it doesn't say that. How do you -- 23 why do you think it's in Raleigh? 24 A. Because if he copied -- he used the wiki in 25 Raleigh, serve drive in Raleigh, install Raleigh</p>
<p style="text-align: right;">Page 23</p> <p>1 Q. Did you review this document to prepare for the 2 deposition? 3 A. Yes. 4 Q. Mr. Zhang; his -- he was a Canadian representative 5 of Chubb? 6 A. He worked for Canada team. 7 Q. Mr. Miroluz reported to you of course in the US? 8 A. Yes. 9 Q. If you reviewed this Exhibit 8 to prepare for 10 disclosure of 527, do you understand what I'm 11 saying? 12 A. This one; right? 13 Q. Yes. Exhibit 8 is -- the subject matter of 14 Exhibit 8 is the installation of Blaze Advisor in 15 Canada? 16 A. No. It's not -- it's saying that it's file server 17 sitting in North Carolina, Raleigh, S-R-E-F-S, 18 system files server 1. That's the drive. He's 19 saying that's what we copied using the cbwiki with 20 the Chubb wiki link, which is in Raleigh, North 21 Carolina. He's saying this is what we copied, and 22 if you want, you can deploy a development server 23 sitting Raleigh, North Carolina. So looking at 24 naming, I can see the Raleigh service. 25 Q. You're reading this -- you're reading from part of</p>	<p style="text-align: right;">Page 25</p> <p>1 because Canada, all the servers for Canada were 2 sitting in Raleigh. 3 Q. What about the servers in Toronto? 4 A. Which server are you talking about? 5 (The reporter asked for repetition.) 6 THE WITNESS: Which server are you talking 7 about? 8 BY MR. HINDERAKER: 9 Q. I'm talking about the servers in Toronto that had 10 Blaze Advisor that -- 11 A. No. Toronto didn't have the servers where you can 12 install this. Toronto -- remember, you're talking 13 about 2010. In 2010, it was Legacy Chubb. Legacy 14 Chubb the only servers were in Raleigh, North 15 Carolina, and Canada was supposed to only use the 16 server. You see the naming convention here, you 17 see the wiki link here, whole thing in Raleigh, 18 North Carolina. Nothing Toronto here. The guy 19 was sitting Toronto. I agree. 20 MR. HINDERAKER: Would mark this as the 21 next one. 22 (Whereupon the material was marked for 23 identification as Exhibit 529.) 24 THE WITNESS: Okay. 25 BY MR. HINDERAKER:</p>

<p style="text-align: right;">Page 26</p> <p>1 Q. Okay. Did you review this exhibit, this e-mail</p> <p>2 which we're now calling Exhibit 529 to prepare for</p> <p>3 the deposition today?</p> <p>4 A. I have seen it.</p> <p>5 Q. Okay. Did you review Exhibit 529 to prepare for</p> <p>6 the deposition today?</p> <p>7 A. I reviewed it, but I don't remember did I review</p> <p>8 yesterday. I don't remember, but I reviewed this</p> <p>9 one.</p> <p>10 Q. Okay, and tell me who Lance Martin is.</p> <p>11 A. Lance was my project monitor for governance in --</p> <p>12 Q. What?</p> <p>13 A. Governance. It's a review of applications. He</p> <p>14 reported to me in Legacy Chubb.</p> <p>15 Q. And we've identified Zorica Todorovic?</p> <p>16 A. Yes.</p> <p>17 Q. He's part of Chubb Canada?</p> <p>18 A. That's correct.</p> <p>19 Q. And the subject matter of Exhibit 529 is CAZ</p> <p>20 ChEAR?</p> <p>21 A. Yes.</p> <p>22 Q. Contact replace, and then the attachment is CAZ</p> <p>23 applications?</p> <p>24 A. Yup.</p> <p>25 Q. And CAZ is an acronym for Canada zone?</p>	<p style="text-align: right;">Page 28</p> <p>1 this document says the data center is Toronto, and</p> <p>2 you said?</p> <p>3 A. Yes. I see Toronto.</p> <p>4 MR. HINDERAKER: Would go ahead and mark</p> <p>5 this please.</p> <p>6 (Whereupon the material was marked for</p> <p>7 identification as Exhibit 530.)</p> <p>8 BY MR. HINDERAKER:</p> <p>9 Q. And Mr. Ramesh, I've given you Exhibit 530. This</p> <p>10 is an e-mail and attachments. I'd just like to go</p> <p>11 through the people on the e-mail first if you'd</p> <p>12 like.</p> <p>13 A. Sure.</p> <p>14 Q. So Cristian Vasilache; who is that individual?</p> <p>15 MS. JANUS: Do you need a moment to review</p> <p>16 the document?</p> <p>17 THE WITNESS: I do a little. Yes.</p> <p>18 BY MR. HINDERAKER:</p> <p>19 Q. Let me know when I can ask you questions.</p> <p>20 A. Okay. Go ahead.</p> <p>21 Q. Give me a second. My first question is: Can you</p> <p>22 identify Cristian Vasilache, the individual from</p> <p>23 whom the e-mail is from?</p> <p>24 A. I don't know the name but -- I don't know who it</p> <p>25 is. I don't know the name.</p>
<p style="text-align: right;">Page 27</p> <p>1 A. Yes.</p> <p>2 Q. And ChEAR is a form of report that Chubb, Legacy</p> <p>3 Chubb used?</p> <p>4 A. ChEAR means Chubb Enterprise Architecture</p> <p>5 Repository.</p> <p>6 Q. What was the last word?</p> <p>7 A. Chubb Enterprise Architecture Repository.</p> <p>8 Q. Repository?</p> <p>9 A. Yes. That was in Raleigh, North Carolina.</p> <p>10 Q. Then if you look at the attachment please to the</p> <p>11 e-mail.</p> <p>12 A. Which page?</p> <p>13 Q. I want you to look at Line 8 -- well, I suppose</p> <p>14 you have to look at the first page that has the</p> <p>15 column headings so that you see under Column L it</p> <p>16 says Data Center Location. Do you see where I'm</p> <p>17 saying?</p> <p>18 A. Okay.</p> <p>19 Q. Okay, and then if you go to Line 8, Column L, this</p> <p>20 document says Toronto; right?</p> <p>21 A. That's a logical name. So --</p> <p>22 Q. Pardon me?</p> <p>23 A. Can I explain it.</p> <p>24 Q. You said something, but I didn't understand that's</p> <p>25 why I said pardon me. This is a? I asked you</p>	<p style="text-align: right;">Page 29</p> <p>1 Q. Okay, and the e-mail is to Alexander Pavlenko?</p> <p>2 A. Yes.</p> <p>3 Q. And he is a Canadian Chubb Canada person?</p> <p>4 A. Yup.</p> <p>5 Q. And again, the attachment is the CAZ ChEAR report?</p> <p>6 A. Um-hm.</p> <p>7 Q. And when you reviewed the document, did you see if</p> <p>8 you were in this communication chain at all?</p> <p>9 A. I didn't see my name, but ...</p> <p>10 Q. Okay. Thank you. Then if we go to the</p> <p>11 attachment, and the ChEAR report, and Line 8.</p> <p>12 A. Yup.</p> <p>13 Q. Under Column N, data center location?</p> <p>14 A. Um-hm.</p> <p>15 Q. This document shows the data center location for</p> <p>16 Evolution Canada as Toronto; correct?</p> <p>17 A. And also read the Column E. As I said, the Blaze</p> <p>18 form will be used in future. Will be. Not is</p> <p>19 used.</p> <p>20 So what they are saying the Blaze will be</p> <p>21 developed, will be used, will be deployed in the</p> <p>22 future in Canada. That's their thought. They are</p> <p>23 saying that I'm prepare for the form that will be</p> <p>24 used for Canada in the future.</p> <p>25 When it comes to process, we say no, it</p>